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January 24, 2002

Ms. Magalie Roman Salas Secretary Federal Communications Commission 445 12th Street, SW, Room TWB-204 Washington, DC 20554

Re:

Notice of Ex Parte Presentation, Application by Verizon-New England, Inc. for Authorization to Provide In-Region, InterLATA Services in Rhode Island CC Docket 01-324

Dear Ms. Salas,

On Wednesday, January 23, 2002, David Lawson and the undersigned, both representing AT&T, met with Rich Lerner, Associate Chief of the Common Carrier Bureau, and Carol Canteen, Raj Kannan, Rhonda Lien, Julie Saulnier, Deena Shetler and Josh Swift of the Common Carrier Bureau's Competitive Pricing Division. Participating by conference call were Larry Lafaro, Michael Lieberman and Richard Rubin, also representing AT&T.

Consistent with its comments filed in this proceeding, AT&T reiterated its arguments that Verizon's UNE rates in Rhode Island are not TELRIC-compliant and reviewed Leiberman Exhibits 1 through 11 of AT&T's comments. In addition, we discussed the New York Public Service Commission's January 23, 2002 UNE rate decision and its impact on Verizon's benchmark analysis. AT&T also presented a slightly revised margin analysis demonstrating Verizon's price squeeze in Rhode Island. The attached was distributed during the meeting and served as the basis of this discussion.

Pursuant to the Commission's November 26, 2001 Public Notice (DA 01-2746), this submission does not count toward AT&T's ex parte page limit. One electronic copy of this Notice is being submitted to the Secretary of the FCC in accordance with the Commission's rules.

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Attachment

Rich Lerner Carol Canteen Deena Shetler Josh Swift

Raj Kannan

Julie Veach

Rhonda Lien Gary Remondino Steve Frias (RPUC) Kelly Trainor (DOJ)

Julie Saulnier

Ann Berkowitz (Verizon)

## **Connectivity Margin for Verizon Rhode Island**

| the state of the s |            |             | Statewide |         |                 |         |     |
|--|------------|-------------|-----------|---------|-----------------|---------|-----|
| COSTS  |            |             | Average   | Zone 1  | Zone 2          | Zone 3  |     |
| Zone weights   |            |             |           | 41%     |                 | 12%     |     |
| Loop   |            |             | \$14.14   | \$11.19 | \$15.44         | \$19.13 |     |
| Port   |            |             | \$4.15    | \$4.15  | \$4.15          | \$4.15  |     |
| Usage  |            |             | \$7.90    | \$7.90  | \$7.90          | \$7.90  |     |
| DUF  |            |             | \$1.20    | \$1.20  | \$1.20          | \$1.20  |     |
| Platform - Recurring Cost  |            |             | \$27.39   | \$24.44 | \$28.69         | \$32.38 |     |
| NRC  |            |             | \$0.00    | \$0.00  | \$0.00          | \$0.00  |     |
| Total Platform (w/NRC)   |            |             | \$27.39   | \$24.44 | \$28.69         | \$32.38 |     |
| REVENUES TO THE SECOND   | -          | RES @ VZ RI |           |         |                 |         |     |
| Basic Local Svc  |            |             |           |         |                 |         |     |
|  | Zone 1 \$  |             |           |         |                 |         | 41% |
|  | Zone 2     |             |           |         | *               |         | 47% |
|  | Zone 3     |             |           |         |                 |         | 12% |
| Basic Local Svc -Si  | atewide \$ | 16.10       |           |         | with the second | 1       |     |
|  |            |             |           |         |                 |         |     |
| Other Revenue Sources  |            |             |           |         |                 |         |     |
| Features   |            | \$3.57      |           |         |                 |         |     |
| Subscriber Line Charge   | \$         | 5.00        |           |         |                 |         |     |
| Access   | \$         | 2.03        |           |         |                 |         |     |
| Total Revenue  |            |             |           | •       |                 |         |     |
|  | Zone 1 \$  | 27.86       |           |         |                 |         |     |
|  | Zone 2     | 26.25       |           |         |                 |         |     |
|  | Zone 3     | 24.49       | ·         |         |                 |         |     |
| Total Revenue -Si  | atewide \$ | 26.70       | :         |         | •               |         |     |
| MACIGINSSIBES @ VZ.HIF   |            | Level       | - %       |         |                 |         |     |
| Zone 1   | \$         | 3.42        | 12%       |         |                 |         |     |
| Zone 2   |            | (2.44)      |           |         |                 |         |     |
| Zone 3   |            |             |           |         |                 |         |     |
| Residence Statewide  |            | (0.69)      | -3%       |         |                 | •       |     |
| Connectivity margin  |            |             | :         |         |                 |         |     |
| •  |            |             |           |         |                 |         |     |